

APPLICATION GRANTED

SO ORDERED

VERNON S. BRODERICK

U.S.D.J. 6/7/2023

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SCARSDALE, NEW YORK 11575

\_\_\_\_\_. All deadlines in this matter are adjourned pending the  
resolution of Defendant's motion to dismiss.  
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June 6, 2023

**Via ECF**

Honorable Vernon S. Broderick  
Judge, United States District Court  
Southern District of New York  
40 Foley Square  
New York, NY 10007

Re: **Paradise Morgan v. Lululemon Athletica Inc.**  
**1:23-cv-434-VSB**

Dear Judge Broderick,

We represent Plaintiff, Paradise Morgan, in the above-referenced action. Pursuant to Your Honor's Individual Rules & Practices, we write with the consent of counsel for Defendant, lululemon athletica inc. ("lululemon") to request an adjournment for the parties to jointly submit a proposed case management plan and scheduling order (the "CMP") while lululemon's motion to dismiss is pending before this Court. The deadline to file the CMP is June 6, 2023. While the parties did file the requisite Joint Letter, the parties hereby jointly agree and respectfully request that this Court adjourn all further actions in this matter including the CMP, to permit the resolution of lululemon's motion to dismiss currently pending before the Court.

lululemon's motion to dismiss was fully submitted to the Court on May 26, 2023 [Docket # 16], and disposition of the motion will determine the scope of discovery in this matter, if discovery is needed at all. Counsel for Plaintiff, on behalf of all parties, respectfully submit that adjournment of the CMP until after lululemon's motion to dismiss is decided would preserve both the parties' and the Court's resources.

We thank the Court in advance for its consideration of this request.

Respectfully submitted,

/s/Dan Shaked

Dan Shaked

cc: All Counsel of Record (via ECF)